TO: John Whiting x3090 CC: A/R

THE ROCKY FLATS LOCAL IMPACTS INITIATIVE

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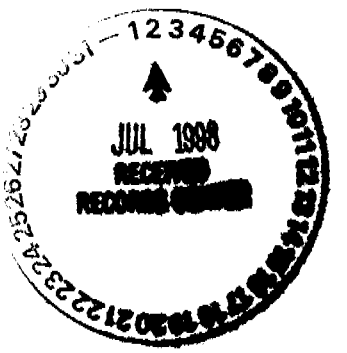

John Rampe
RFFO Planning and Integration
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Golden, CO 80402-0928

Dear John:

This letter is in response to review of the draft interim measure/interim remedial action plan for the 886 cluster. At its meeting June 4, 1998, the Rocky Flats Local Impacts Initiative Board authorized the following comments.

1. We request a meeting prior to specific action plans for the tunnel. We have two concerns. First that the tunnel contains radiological contamination. Rather than decontamination only to a free release standard, we would like information about the implications of an ALARA approach and what the residual levels would likely be. Secondly, the Rocky Flats Industrial Area Transition Task Force has recommended that residual infrastructure, even if below action levels, should be removed in order to preserve options for future reuse of the industrial area. We have concern that leaving a tunnel in place backfilled with debris is not in the spirit of the RFCA Vision that says the site will be suitable for use as an employment center. This is especially true since 886 is a pilot project.

2. The IM/IRA does not specify the preferred disposition of building rubble. It suggests that rubble will be defined as sanitary waste if it meets the free release criteria of 10 CFR 835. Has RFETS made a policy decision about this issue? We understood it would be developed in cooperation with the D&D Working Group. Is the rubble planned to be disposed inside the tunnel, at another location on the site, and/or taken to Erie?

3. We recognize there may not be a large number of items of personal property in this building cluster suitable for release to the public, but as a pilot, the proper procedures should be followed. There may be laboratory items that would be of value to schools or universities, in addition to equipment of interest to RFLII companies. Section 6.2 states that "if the cost to demonstrate that the item is not contaminated exceeds the cost

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for waste disposal, the items will be disposed of as waste." This is not accurate. Our understanding of the process is that the value of the item must also be factored in as an offset to rad screening costs. May we have a list of the inventory and an opportunity--as we did for Building 779--to review the determinations prior to equipment being determined as waste?

Thank you for the opportunity to comment.

Sincerely,

DeAnne

DeAnne Butterfield
Executive Director

CC: A/R

To: John Corsi (KH)
cc: John Whiting, Steve Tarlton
FROM:: Edd Kray, CDPHE 886 Project mgr
DATE:May 11, 1998
SUBJECT: Bldg. 886 IM/IRA Comments

Section Comment

General Several documents/procedures associated with the decommissioning of this cluster are either yet to be developed or have not been submitted to CDPHE. These procedures include: IWCPs for decommissioning areas/rooms; Activity Hazard Analyses for work to be performed; Demolition Plan for the cluster; the soil/slab sampling and analysis plan; and the Final Radiological Survey Plan. The IM/IRA should be written to clearly define what documents need to be developed, what the time frames are for their development, how the LRA is involved (i.e., review and/or approval), and what the time frames are for the LRA review/approval.

1.2 Building rubble generated during this project that meets unrestricted release criteria is considered a solid waste. Use of this material as backfill is inappropriate. This material needs to be disposed-of in accord with State and County solid waste requirements. Delete reference to disposal as backfill.

2.2 What is the basis for the 50 ppm lead/metals concentration hazard?

Table 4-1 Activities identified include decontamination of lead/metals in paint on floor and walls and decontamination of PCBs from HEUN lines and electrical boxes. Table 4-7, however, indicates no plan to decontaminate either contaminant.

4.1.1.3 What is the basis for the statement "waste streams that exceeds the toxicity characteristic thresholds....will not be generated."? Intrusive activities such as scabbling and grinding performed on lead and/or PCB based painted walls and floors will likely generate paint chips. How will these paint chips be managed?

4.1.3.1 Again, isn't there a potential to disturb the lead and/or PCB based paint and generate hazardous paint chips?

4.1.3.2 Further information is needed regarding the soils associated with this activity. Specifically, the IM/IRA fails to identify IHSS 164.2 and PAC 800-1203. A description of these two potential areas of concern should be included. In addition, the sampling and analysis plan for the 886 slab and soils must be developed and approved by the LRA. This sampling and analysis plan must be sufficient to adequately rank the IHSS and under building contamination in the area or justify a No Further Action.

5.3.4 The State's APCD should be included in the monitoring evaluation prior to demolition.

Table 6-1 What lead is to be recycled?

6.3 Provide a copy of the *886 Cluster Closure Project Waste Management Plan.*

6.4 Additional information/discussion is needed prior to establishing a temporary unit(s). Specifically, several requirements identified in 6 CCR 1007-3, Section 264.553 are substantive.

p 11, par 2 The paragraph states that radiological contamination was characterized by process knowledge and existing surveys. KH must be reminded that this level of characterization, based on previously obtained information, may not be adequate to provide sufficient detail on residual contamination in order to protect workers and the environment during decommissioning and dismantlement operations. The process of decommissioning is one in which management must expect the unexpected. Radiological contamination may exist in hidden locations, within abandoned piping, under equipment which has been unmoved for years, behind cabinets, under tanks and so forth.

Please explain in detail the efforts which 886 staff will make to adequately identify the hidden areas of contamination so that unnecessary exposures or releases will not occur during the decommissioning process. t.

(p19) The charts mention management reviews in several places without further specificity as to items to be covered, schedules or scope. Please provide a more detailed description of KH's intent regarding management reviews within the responsiveness document. How many will be done? At what phases of the project? What level of FTE resources will be provided? Describe their scope in greater detail.

(p27, Table 4-6) These unrestricted release activities are, of course, only applicable to surface contamination and surface activity levels. No mention is made of standards for any materials which may be contaminated in volume. Will 886 continue to apply the DOE no-rad-added standard to volumetric materials from the 886 project?

(p28, sec. 4.1.2) The decision document should be prepared in adequate detail to describe the decontamination methods to be specifically used and which areas on which they will be used. A generic table of choices is inadequate.

(p32.) When will the demo plan be prepared? The plan will need CDPHE review and approval, Will the plan be submitted for public review? It might be advisable to mention that demolition will proceed only after the building has been decontaminated to free-release standards.

(p34) Please submit a copy of the 886 specific Health and Safety Plan for the CDPHE record.

(p 38) Please add "awareness and adequate characterization to identify previously hidden contamination" to the preventative measure block of the "cut out piping systems" in the preliminary hazards analysis.

(p40, perform decon operations) Add "use engineering controls to reduce airborne contamination" to the preventative measures column.

(p44,45) The commitments regarding air monitoring are of inadequate detail. If "an evaluation of the need for additional monitoring is to be performed prior to demolition", CDPHE must be part of this evaluation. The demolition air monitoring program must be reviewed and approved by CDPHE,

It is unlikely that a sampling program based on existing site monitoring stations alone will be approved. Monitoring, specific and most sensitive to the demolition project, will be needed.

(p 55) How will radioactive wastes be stored until transfer to approved RFETS storage buildings? Has a hazards analysis been performed for storage of wastes in the 886 proximity? Is rad waste storage in the 886 complex evaluated under the new BIO. Does an ops order exist to specify rad waste storage controls until the wastes are moved elsewhere onsite?